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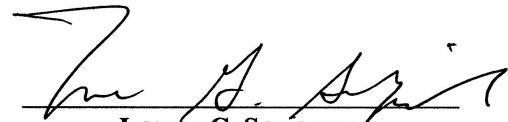
December 9, 2021

Plaintiff's application for an extension is DENIED because discovery can commence prior to any potential amendment of Plaintiff's Amended Complaint. Plaintiff and Defendants shall appear for an initial pre-trial conference on December 16, 2021, at 10:50 A.M. on conference line 888-363-4749, using access code 558-3333.

Via ECF

Honorable Lorna G. Schofield, U.S.D.J.
Southern District of New York
500 Pearl Street
New York, NY 10007

Dated: December 9, 2021
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Morrison v. Barclays Bank, et al., SDNY Case No. 21-CV-3612 (LGS)

Dear Judge Schofield:

My office, together with Mobilization for Justice, Inc., represents the plaintiff, James Morrison, in the above-referenced case. I am writing on behalf of Plaintiff to request a 45-day extension of the deadline of December 10, 2021, to submit the Case Management Plan and Joint Letter. I am making this request because as I explained in my letter dated November 30, 2021, Plaintiff is planning on moving to amend the complaint to add claims under the Fair Credit Reporting Act. This will entail adding the three big credit-reporting agencies ("CRAs"), Experian, Equifax, and Trans Union as defendants. Any case management plan would require the involvement of these defendants.

Plaintiff anticipates having a motion to amend the complaint on file no later than December 23, 2021, if not sooner. Plaintiff would have moved to add these defendants before now, but the FCRA claims were not ripe.

Last night, I sent the text of this letter to Martin Bryce, Esq. and Althea Daley, Esq., counsel for Barclays Bank, and to James Arnold, Esq., counsel for the Surplus Freight Defendants. Mr. Bryce had no objections; Mr. Arnold has not yet responded.

Respectfully,

/s/ Brian L. Bromberg
Brian L. Bromberg

cc: All Counsel of Record (Via ECF)
James E. Arnold, Esq. (Via Email: jarnold@arnlaw.com & First-Class Mail)